

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

**REQUEST TO FILE SUPPLEMENT TO MOTION FOR CORRECTIVE
ACTION REGARDING FBI INTERFERENCE WITH DEFENSE ACCESS TO
POTENTIAL WITNESSES UNDER SEAL AND EX PARTE**

Defendant, Robert Bowers, through undersigned counsel, respectfully requests an order allowing him to file a supplement to his Motion for Corrective Action Regarding FBI Interference with Defense Access to Potential Witnesses under seal and *ex parte*. In support of this request, counsel state as follows:

1. On May 29, 2019, undersigned counsel filed a Motion for Corrective Action Regarding FBI Interference with Defense Access to Potential Witnesses.
 2. The supplement counsel seeks to file under seal and *ex parte* provides the Court with specific information regarding defense counsel's knowledge of the interference. It contains the names of potential witnesses and their communications with a member of the defense team. Revelation of the supporting document will disclose what was intended to be a non-public communication and risk further potential interference and/or misleading information by the FBI.
 3. Undersigned requests permission to file the supplement under seal and *ex parte* without the filing of a redacted version.

Dated: May 29, 2019

Respectfully submitted,

/s/ Judy Clarke

Judy Clarke

Clarke Johnston Thorp & Rice, PC

/s/ Michael J. Novara

Michael J. Novara

First Assistant Federal Public Defender

/s/ Elisa A. Long

Elisa A. Long

Assistant Federal Public Defender

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
v.)
ROBERT BOWERS)
Criminal No. 18-292

ORDER OF COURT

Upon consideration of Robert Bowers' Motion to File a Supplement to the Motion
for Corrective Action Regarding FBI Interference with Defense Access to Potential
Witnesses Under Seal and *Ex Parte*, it is hereby ORDERED that the Motion is
GRANTED.

It is further ORDERED that the document shall remain sealed until further Order of the Court.

It is further ORDERED that Mr. Bowers is not required to file a redacted version of the document.

Date

Donetta W. Ambrose
United States District Judge